



Schering Laboratories

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Schering-Plough Corporation
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Ms. Rebecca Kane
U.S. Environmental Protection Agency
Office of Enforcement and Compliance Assurance
Mail Code 2222A
1200 Pennsylvania Avenue NW
Washington, DC 20460

Re: Comments-Environmental and Compliance History Online (ECHO)
Schering-Plough Corporation

Dear Ms. Kane:

Attached you will find Schering-Plough Corporation's comments on the referenced database that appeared in a November 20, 2002 Federal Register (67 Fed. Reg. 70079) Notice. These comments were compiled for both Schering-Plough's existing facilities and for Schering-Plough's former facilities where errors were identified in the ECHO database.

The comments are straight forward for each facility as each page of the database is reproduced and necessary changes are identified. Facility comments are separated by color pages for ease of reading.

In addition to the site-specific changes, Schering-Plough wishes to comment in general on the ECHO database. It was our experience that the navigational aspects of the database were inconsistent when performing search functions by name, or by address, or by zip codes, etc. In some cases, dramatic differences in results were obtained. If a regulated entity is not persistent in reviewing this database, they may miss several entries for their facilities. Recent use of the ECHO program has seen navigational improvements.

Another issue that led to difficulty in reviewing a facility's compliance history is the timeframes referenced on the database. Many facilities and state agencies do not maintain records going back to 1981 making it difficult to confirm citations listed by the Agency. It is suggested that historical data be restricted to the past five years.

Lastly, we found that the issue of 'former' facilities warrants further review. As companies are merged, acquired, or integrated into new entities, there will be a need to update the ECHO database in a timely fashion to accurately reflect the current ownership. In addition, the transfer of permits or the deactivation of permit numbers will be critical to ensure accuracy of the ECHO database since the public will be using this database more frequently in the future.

If after review there are any questions, please don't hesitate to contact me at (908) 629-3426 or via e-mail at joseph.cerchiaro@spcorp.com.

Respectfully submitted,



J. Russell Cerchiaro
Manager, Environmental Regulatory
Affairs and Program Development